

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

IN RE VITAMIN C ANTITRUST
LITIGATION

MASTER FILE 06-MD-1738 (BMC) (JO)

**This Document Relates To:
ALL CASES**

**DIRECT AND INDIRECT PURCHASER PLAINTIFFS' NOTICE OF MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENTS WITH
DEFENDANT ALAND (JIANGSU) NUTRACEUTICAL CO., LTD.**

PLEASE TAKE NOTICE THAT, upon Plaintiffs' Motion for Preliminary Approval of Settlements with Defendant Aland (Jiangsu) Nutraceutical Co., Ltd., and for certification of an Indirect Purchaser Damages Settlement Class, dated May 21, 2012, and all other papers and proceedings herein, Plaintiffs will move this Court on a date and time to be set by the Court, before the Honorable Brian M. Cogan, United States District Judge, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, pursuant to Rule 23 of the Federal Rules of Civil Procedure, to enter an order:

1. preliminarily approving the Certified Classes Settlement Agreement and find that its terms are sufficiently fair, reasonable, and adequate for notice to be issued to the certified classes;
2. preliminarily approving the Indirect Purchaser Settlement Agreement and find that its terms are sufficiently fair, reasonable, and adequate for notice to be issued to proposed Indirect Purchaser Damages Settlement Class;
3. certifying the Indirect Purchaser Damages Settlement Class, for purposes of settlement only pursuant to Federal Rule of Civil Procedure 23(c), authorizing Indirect Purchaser Plaintiffs to represent the Indirect Purchaser Damages Settlement Class, and appointing Class Counsel for the Indirect Purchaser Damages Settlement Class;
4. ordering Class Counsel to disseminate notice to the Classes, upon submission of proposed notices and approval by the Court of the form of notice and the notice plan; and
5. approving Rust Consulting as Administrator of the Settlements, and Citibank as Escrow Agent.

Oral argument on this motion, if any, will be held on a date and time set by the Court.

Dated: May 21, 2012

Respectfully submitted,

/s/ Michael D. Hausfeld

Michael D. Hausfeld
Brian A. Ratner
Brent W. Landau
HAUSFELD LLP
1700 K Street, NW Suite 650
Washington, DC 20006
Tel: (202) 540-7200
Fax: (202) 540-7201

/s/ William A. Isaacson

William A. Isaacson
Tanya Chutkan
Jennifer Milici
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Avenue, NW, Suite 800
Washington, DC 20015
Tel.: (202) 237-2727
Fax: (202) 237-6131

/s/ James T. Southwick

James T. Southwick
Shawn L. Raymond
Suyash Agrawal (SA-2189)
SUSMAN GODFREY L.L.P.
1000 Louisiana, Suite 5100
Houston, TX 77002
Tel.: (713) 651-9366
Fax: (713) 654-6666

Alanna Rutherford (AR-0497)
BOIES, SCHILLER & FLEXNER LLP
575 Lexington Avenue, 7th Floor
New York, New York 10022
Tel: (212) 446-2300
Fax: (212) 446-2350

*Co-Lead Counsel for the Certified Direct
Purchaser Damages Class and Injunction
Class*

/s/ Daniel E. Gustafson

Daniel E. Gustafson
Daniel C. Hedlund
Michelle J. Looby
GUSTAFSON GLUEK, PLLC
650 Northstar East
608 Second Avenue South
Minneapolis, MN 55402
Tel: (612) 333-8844
Fax: (612) 339-6622

/s/ Timothy Battin

David Boies
Timothy Battin
STRAUS & BOIES, LLP
4041 University Drive, Fifth Floor
Fairfax, VA 22030
Tel: (703) 764-8700
Fax: (703) 764-8704

/s/ R. Alexander Saveri

R. Alexander Saveri

SAVERI & SAVERI, INC.

111 Pine Street

Suite 1700

San Francisco, CA 94111

Tel: (415) 217-6810

*Co-Lead Counsel for Putative Indirect
Purchaser Settlement Class*